

REMARKS

Applicants express appreciation to the Examiner for the courtesy of an interview granted to applicants' representative Marc A. Berger (Reg. No. 44,029). The interview was held by telephone on Monday, August 7, 2006. Applicants filed an Interview Summary on September 12, 2006. To the extent a summary is required in this document, the Interview Summary of September 12, 2006 is incorporated by reference herein.

Applicants have carefully studied the outstanding Office Action. The present amendment is intended to place the application in condition for allowance and is believed to overcome all of the objections and rejections made in the Office Action. Favorable reconsideration and allowance of the application are respectfully requested.

Applicants have canceled claims **22 – 24** and **47 - 49**, and amended claims **1, 17, 18, 25, 26, 42, 43, 50, 51, 62, 63, 67, 68, 70, 72, 83, 84, 91, 115, 119, 120, 123, 124, 128, 129, 132, 141, 142** and **171 - 174** to more properly claim the present invention. No new matter has been added. Claims **1 – 12, 14 - 18, 25 – 37, 39 - 43, 50 – 58, 60 - 63, 67 – 79, 81 – 84, 88 – 92, 115 – 132, 141, 142 – 153, 157 – 167** and **171 - 175** are presented for examination.

On pages 2 and 3 of the Office Action, the Office Action indicates that claims **17, 18, 25, 42, 43, 50, 62, 63, 70, 83, 84, 91, 119, 120, 123, 128, 129** and **132** contain trademarks/trade names and, as such, are indefinite and do not comply with 35 U.S.C. §112, second paragraph. Applicants have accordingly amended these claims to remove the use of trademarks/trade names.

On pages 3 - 10 of the Office Action, in Paragraphs I and II, the Office Action rejects claims **1 – 3, 5 – 8, 12, 14 – 18, 24 – 28, 30 – 33, 37, 39 – 43, 49 – 53, 55 – 58, 60 – 63, 69 – 74, 76 – 79, 81 – 84, 90 – 92, 171** and **172** under 35 U.S.C. §103(a) as being unpatentable over Howard et al., U.S. Patent Application Publication 2001/0042045 (“Howard”) in view of Ram et al., U.S. Patent Application Publication 2002/0194485 (“Ram”). Applicants have canceled claims **24** and **49** without acquiescence to the Office Action's reasons for rejection and respectfully submit that rejection of those claims is thus rendered moot.

On pages 10 and 11 of the Office Action, in Paragraph III, the Office Action rejects claims **4, 29, 54** and **75** under 35 U.S.C. §103(a) as being unpatentable over Howard and further in view of the definition of XML.

On pages 11 - 14 of the Office Action, in Paragraph IV, the Office Action rejects claims **9 – 11, 22, 23, 34 – 36, 47, 48, 67, 68, 88 and 89** under 35 U.S.C. §103(a) as being unpatentable over Howard in view of Ram and further in view of Bloomberg, U.S. Patent No. 5,761,686 (“Bloomberg”). Applicants have canceled claims **22, 23, 47 and 48** without acquiescence to the Office Action’s reasons for rejection and respectfully submit that rejection of those claims is thus rendered moot.

On pages 14 – 18 of the Office Action, in Paragraph V, the Office Action rejects claims **115 – 132, 141, 142 and 174** under 35 U.S.C. §103(a) as being unpatentable over Lesk, U.S. Patent No. 5,905,505 (“Lesk”) in view of Ram.

On pages 18 – 21 of the Office Action, in Paragraph VI, the Office Action rejects claims **143 – 153, 157 – 167 and 175** under 35 U.S.C. §103(a) as being unpatentable over Lesk in view of Ram.

Distinctions between Claimed Invention and U.S. Patent Application Publication 2001/0042045 to Howard et al. in view of U.S. Patent Application Publication 2002/1094485 to Ram et al. and further in view of U.S. Patent No. 5,761,686 to Bloomberg

Howard describes a limited-use browser and security system that protects content downloaded from the Internet to a client computer from being copied without authorization. The downloaded content is displayed in a view-only mode and, while the content is being displayed, menu selections, key combinations and pointing device commands initialized on the client computer that can copy content are disabled (Howard / paragraph [0020]).

Howard describes two security models for protecting transmitted content; namely, an individual security model that generates a secure document package, and a common security model that uses encryption (Howard / paragraph [0045]). The secure document package is a dynamically compiled executable, and is encrypted using individual user level encryption keys (Howard / paragraphs [0046], [0072], [0108], **FIG. 3**). The common security model transmits a stream of encrypted content to the client computer, and is encrypted using a system level encryption key (Howard / paragraphs [0046], [0082], [0086], [0108]). Howard describes encryption performed at step **445** of **FIG. 4C**, and corresponding decryption performed at step **527** of **FIG. 5B**.

Ram describes a self-protecting document (SPD) that contains encrypted proprietary content, and that can decrypt itself for viewing or printing

without storing a clear (i.e., unencrypted) electronic copy on a user's computer (Ram / paragraph [0043], **FIGS. 3 – 5**). The SPD is thereby copy-protected in accordance with its digital rights. Ram uses a rendering operation that is applied directly to an encrypted document, having the property that decrypting the rendered encrypted document is equivalent to rendering the clear document (Ram / paragraph [0083]).

Bloomberg describes a method for embedding information within an iconic version of a text image. The encoding method of Bloomberg is similar to that of a bar-code, in that it uses rectangular blocks of varying sizes, as indicated in **FIG. 10**, to represent data. The rectangular blocks are contained within an iconic image, such as the iconic image **20** of **FIG. 2**, used to represent an image of text, such as the text image **10** of **FIG. 1**. Bloomberg describes generating the iconic image so that it has the same characteristic layout appearance as the text image when rendered for display (Bloomberg / col. 4, lines 37 – 42; col. 5, lines 36 – 38; col. 11, line 66 – col. 12, line 5; col. 25, lines 7 - 13)

The claimed invention describes a method and system for encrypting data within web pages, and for controlling the formatting of the web page so that the page is formatted for the data as it would be decrypted, instead of for the encrypted data contained within the page. As such, (i) if the web page is saved or copied, the saved or copied data includes only encrypted text (**FIG. 1A**); yet (ii) if the web page is displayed by a web browser, the displayed page includes only decrypted text (**FIG. 1B**).

Thus the claimed invention displays a text image, such as a web page displayed within a web browser, from a source text file, such as an HTML file, where the text image includes text that is different from the text of its source file. Specifically, the source file includes encrypted text, and the text image includes decrypted text. The claimed invention carefully intervenes with the formatting of the text image so that it is formatted according to the decrypted text, and not according to the encrypted text within the source file. Effectively, as described at paragraph [0075] of the original specification, the claimed invention “fools” the formatting *“into believing that the encrypted text does indeed have the same character and word sizes as the original text, when in fact it does not.”*

The rejections of claims **1 – 12, 14 – 18, 25 – 37, 39 – 43, 50 – 58, 60 – 63, 67 – 79, 81 – 84, 88 – 92, 115 – 132, 141, 142 – 153, 157 – 167** and **171 – 175** on pages 3 - 21 of the Office Action will now be dealt with specifically.

As to amended independent method claim **1** and amended independent claim **171** for a computer-readable medium, applicants respectfully submit that the limitation in claim **1** and claim **171** of

“dynamically generating a display layout for the page based on spatial characteristics of decrypted text instead of spatial characteristics of the encrypted text, to ensure that the display layout for the page corresponds to that of a page containing the designated portion of original text, said determining comprising decrypting encrypted text strings within a patched operating system function, the operating system function being used for determining spatial characteristics of text, wherein spatial characteristics of text include at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations”

is neither shown nor suggested in Howard, Ram or Bloomberg, taken individually or in any combination.

The Office Action indicates on page 4 that the above claim limitation is not explicitly disclosed by Howard, but is taught by Ram. Specifically, the Office Action cites Ram as teaching *“a rendering application which carries out a formatting process and then sends the polarized data to be de-polarized and then restored the original form of the document as the presentation data, thus the layout is determined based on the spatial characteristics off the decrypted; i.e. original text.”* Applicants respectfully submit that the above claim limitation does not read on the cited teachings of Ram. Specifically:

- The term *“polarization key,”* as used in Ram with respect to data processing, is not a commonly used term. Internet searches for this term yielded no results relating to data processing. Applicants respectfully request a definition of this term, so that applicants can better understand the Office Action's claim rejection.
- As indicated in Ram, paragraphs [0044] – [0046], polarizer **412** *“receives the user's private key 414 and, via a decryption step 416, decrypts the document contents 410. Concurrently, the polarizer 412 receives a polarization key from the user's system.”* There is no mention in Ram of spatial characteristics of decrypted text, as in the above claim limitation.

To further clarify the distinction between the claimed invention and Ram, applicants have amended claim **1** to include the meaning of *“spatial*

characteristics.” The prior art cited does not describe intervening with page layout generation vis a vis such spatial characteristics.

In addition, applicants have further amended claim **1** to include the limitation of dynamically generating a display layout within a rendering step. As explained in the original specification at [0066] and [0067], structured documents such as Microsoft Word documents, include pre-determined layouts, whereby font sizes, character, line and paragraph spacings, margins, white spaces, indentations, and line feeds are pre-set. In distinction, layouts for less structured documents such as HTML web pages, are not pre-determined, but instead are dynamically generated at the time of rendering. The cited prior art does not describe dynamic generation of display layouts.

Although, in rejecting claims **22** and **23** (now canceled) that involve widths of character strings, the Office Action cites Bloomberg, col. 8, lines 4 – 8, applicants have argued in their previous office action response that there is no motivation for combining the teachings of Howard and Bloomberg, other than possibly gleaned from the Applicants' disclosure. Indeed, these teachings relate to two different applications. Howard relates to copy protection of content using data encryption (Howard / paragraphs [0046]; **FIGS. 4C** and **5B**), and Bloomberg relates to embedding messages within iconic images, similar to the way that messages are embedded within bar codes (Bloomberg / col. 4, lines 23 – 52). Bloomberg does not relate to copy protection or more generally to security, and it would be a stretch of the imagination to apply the teachings of Bloomberg to copy protection.

Applicants have yet further amended claim **1** to include the limitation of “*decrypting encrypted text strings within a patched operating system function, the operating system function being used for determining spatial characteristics of text*”. Although the Office Action, in rejecting claims **24**, cites Ram, paragraph [0068], as teaching a patched operating system function for determining widths of character strings, applicants respectfully submit that no such patching is described at the location cited. The term “*patching*” is defined in the original specification at paragraph [0084] as intervening with a function call, including (i) inserting additional instructions into the function itself, (ii) re-directing a call to the function with a call to a different function, or (iii) changing an address of the function within a look-up table to an address of a different function. The prior art cited does not describe patching of operating system functions.

Because claims **2 – 12**, **14 – 18** and **25** depend from claim **1** and include additional features, applicants respectfully submit that claims **2 – 12**, **14 – 18**

and **25** are not anticipated or rendered obvious by Howard, Ram, Bloomberg, or any combination of Howard, Ram and Bloomberg.

In rejecting claim **16**, the Office Action cites Ram, paragraph [0049], as teaching a patched operating system function for outputting content. As above, the term “*patching*” is defined in the original specification at paragraph [0084] as intervening with a function call, including (i) inserting additional instructions into the function itself, (ii) re-directing a call to the function with a call to a different function, or (iii) changing an address of the function within a look-up table to an address of a different function. The prior art cited does not describe patching of operating system functions.

Accordingly claims **1 – 12, 14 – 18, 25** and **171** are submitted to be allowable.

As to amended independent system claim **26**, applicants respectfully submit that the limitation in claim **26** of

“a page formatter controlling a display layout for the page, by dynamically generating a display layout based on spatial characteristics of decrypted text instead of spatial characteristics of the encrypted text, to ensure that the display layout corresponds to that of a page containing the designated portion of original text, said page formatter comprising a string decoder for decrypting encrypted text strings, said string decoder operating within a patched operating system function, the operating system function being used for determining spatial characteristics of text, wherein spatial characteristics of text include at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations”

is neither shown nor suggested in Howard, Ram or Bloomberg, taken individually or in combination. Applicants' arguments presented above with respect to claim **1** apply to claim **26**.

Because claims **27 – 37, 39 - 43** and **50** depend from claim **26** and include additional features, applicants respectfully submit that claims **27 – 37, 39 - 43** and **50** are not anticipated or rendered obvious by Howard, Ram, Bloomberg, or any combination of Howard, Ram and Bloomberg. Applicants' arguments presented above with respect to claim **16** apply to claim **41**.

Accordingly claims **26 – 37, 39 - 43** and **50** are submitted to be allowable.

As to amended independent method claim **51** and amended independent claim **172** for a computer-readable medium, applicants respectfully submit that the limitation in claim **51** and claim **172** of

“intervening with at least one function that controls page display layouts, comprising dynamically generating a display layout for the page based on spatial characteristics of decrypted text instead of spatial characteristics of the encrypted text, to ensure that the display layout for the page corresponds to that of a page containing decrypted text, wherein spatial characteristics of text include at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations”

is neither shown nor suggested in Howard, Ram or Bloomberg, taken individually or in any combination. Applicants' arguments presented above with respect to claim **1** apply to claims **51** and **172**.

Because claims **52 – 58, 60 - 63** and **67 - 71** depend from claim **51** and include additional features, applicants respectfully submit that claims **52 – 58, 60 - 63** and **67 - 71** are not anticipated or rendered obvious by Howard, Ram, Bloomberg, or any combination of Howard, Ram and Bloomberg. Applicants' arguments presented above with respect to claims **16** and **24** apply to claims **61** and **69**, respectively.

Accordingly claims **51 – 58, 60 – 63, 67 – 71** and **172** are submitted to be allowable.

As to amended independent system claim **72**, applicants respectfully submit that the limitation in claim **72** of

“a page formatter controlling a display layout for the page, by dynamically generating a display layout based on spatial characteristics of decrypted text instead of spatial characteristics of encrypted text, to ensure that the display layout corresponds to that of a page containing decrypted text, wherein spatial characteristics of text include at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations”

is neither shown nor suggested in Howard, Ram or Bloomberg, taken individually or in any combination. Applicants' arguments presented above with respect to claim **1** apply to claim **72**.

Because claims **73 – 79, 81 - 84** and **88 - 92** depend from claim **72** and include additional features, applicants respectfully submit that claims **73 – 79, 81 - 84** and **88 - 92** are not anticipated or rendered obvious by Howard, Ram, Bloomberg, or any combination of Howard, Ram and Bloomberg. Applicants' arguments presented above with respect to claims **16** and **24** apply to claims **82** and **90**, respectively.

Accordingly claims **72 – 79, 81 - 84** and **88 - 92** are submitted to be allowable.

Distinctions between Claimed Invention and U.S. Patent No. 5,905,505 to Lesk in view of U.S. Patent Application Publication 2002/1094485 to Ram et al.

As mentioned in the original specification at paragraphs [0008] and [0009], Lesk describes a method and system for copy-protecting text that is displayed on a computer screen (Lesk / col. 3, lines 1 – 8; col. 4, lines 38 – 42; col. 6, lines 30 – 32). Lesk operates on bitmap images of ordinary text, instead of conventional ASCII text (Lesk / col. 2, lines 27 – 32; col. 5, lines 55 – 59). Lesk generates two perturbed images, by adding random bits to a bit-mapped image of the text, and displays the two perturbed images in rapid alternating succession. In this way, a user sees the desired image of text as his eyes average the perturbed images, but at any given moment only a single perturbed image is displayed on the screen. Thus, someone copying data from the screen only captures a perturbed image (Lesk / col. 5, line 59 – col. 6, line 10). Lesk describes (i) perturbations that vary background bits (Lesk / FIG. 2A – 2C), and (ii) perturbations that vary text bits (Lesk / FIGS. 4A – 4C).

As to amended independent method claim 115 and amended independent claim 173 for a computer-readable medium, applicants respectfully submit that the limitation in claim 115 and claim 173 of

“formatting a page containing a first portion of text to determine a page layout for display, comprising intervening with at least one function that controls page display layouts, to base the page layout on spatial characteristics of a second portion of text instead of spatial characteristics of a first portion of text, to ensure that the display layout corresponds to that of a page containing the second portion of text, wherein spatial characteristics of text include at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations”

is neither shown nor suggested in Lesk or Ram, taken individually or in combination. Applicants' arguments presented above with respect to claim 1 apply to claims 115 and 173.

Because claims 116 – 123 depend from claim 115 and include additional features, applicants respectfully submit that claims 116 – 123 are not anticipated or rendered obvious by Lesk, Ram, or a combination of Lesk and Ram. Applicants' arguments presented above with respect to claims 16 and 24 apply to claims 118 and 122, respectively.

Accordingly claims **115 – 123** and **173** are submitted to be allowable.

As to amended independent system claim **124**, applicants respectfully submit that the limitation in claim **124** of

“a page formatter formatting a page containing a first portion of text to determine a page layout for display, but based on spatial characteristics of a second portion of text instead of spatial characteristics of a first portion of text, to ensure that the display layout corresponds to that of a page containing the second portion of text, wherein spatial characteristics of text include at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations”

is neither shown nor suggested in Lesk or Ram, taken individually or in combination. Applicants' arguments presented above with respect to claim **1** apply to claim **124**.

Because claims **125 - 132** depend from claim **124** and include additional features, applicants respectfully submit that claims **125 - 132** are not anticipated or rendered obvious by Lesk, Ram, or a combination of Lesk and Ram. Applicants' arguments presented above with respect to claims **16** and **24** apply to claims **127** and **131**, respectively.

Accordingly claims **124 - 132** are submitted to be allowable.

As to amended independent method claim **141** and independent claim **174** for a computer-readable medium, applicants respectfully submit that the limitation in claim **141** and claim **174** of

“replacing first text strings with second text strings within a patched operating system function, the operating system function being used for formatting a page to determine a page display layout”

is neither shown nor suggested in Lesk or Ram, taken individually or in combination.

The term “patching” is defined in the original specification at paragraph **[0084]** as intervening with a function call, including (i) inserting additional instructions into the function itself, (ii) re-directing a call to the function with a call to a different function, or (iii) changing an address of the function within a look-up table to an address of a different function. The prior art cited does not describe patching of operating system functions.

Accordingly claims **141** and **174** are submitted to be allowable.

As to amended independent system claim **142**, applicants respectfully submit that the limitation in claim **142** of

“a string processor replacing first text strings with second text strings, said string processor operating within a patched operating system function used for formatting a page to determine a page display layout”

is neither shown nor suggested in Lesk or Ram, taken individually or in combination.

As above, the term “patching” is defined in the original specification at paragraph **[0084]** as intervening with a function call, including (i) inserting additional instructions into the function itself, (ii) re-directing a call to the function with a call to a different function, or (iii) changing an address of the function within a look-up table to an address of a different function. The prior art cited does not describe patching of operating system functions.

Accordingly claim **142** is submitted to be allowable.

Distinctions between Claimed Invention and U.S. Patent No. 5,905,505 to Lesk in view of U.S. Patent Application Publication 2001/0042045 to Howard et al.

As to independent method claim **143** and independent claim **175** for a computer-readable medium, applicants respectfully submit that the limitation in claim **143** and claim **175** of

“the source file from which the page is rendered contains a third portion of text in place of the first portion of text, the third portion of text being different than the first portion of text”

is neither shown nor suggested in Lesk or Howard, taken individually or in combination.

In rejecting claim **143**, the Office Action cites Lesk as teaching that the source file opened by the Internet web browser to render the page contains a third portion of text. Applicants respectfully submit that this is not the case, because the source file that renders the page with the first (readable) portion of text **32** in **FIG. 7** of Lesk, in fact itself contains the same readable portion of text **32**. Similarly, the source file that renders the page with the third (encrypted) portion of text **27**, itself contains the same encrypted portion of text **27**. In distinction, the claimed invention has the “magic” feature that the source file that renders the page with text **32**, itself contains text **27**.

Because claims **144 - 153** depend from claim **143** and include additional features, applicants respectfully submit that claims **144 - 153** are not

anticipated or rendered obvious by Lesk, Howard, or a combination of Lesk and Howard.

Accordingly claims **143 - 153** and **175** are submitted to be allowable.

As to independent system claim **157**, applicants respectfully submit that the limitation in claim **157** of

“the source file from which the page is rendered contains a third portion of text in place of the first portion of text, the third portion of text being different than the first portion of text”

is neither shown nor suggested in Lesk or Howard, taken individually or in combination. Applicants' arguments presented above with respect to claim **143** apply to claim **157**

Because claims **158 - 167** depend from claim **157** and include additional features, applicants respectfully submit that claims **158 - 167** are not anticipated or rendered obvious by Lesk, Howard, or a combination of Lesk and Howard.

Accordingly claims **157 - 167** are submitted to be allowable.

Support for New and Amended Claims in Original Specification

Independent claims **1, 26, 51** and **72** have been amended to include the limitation of dynamic generation of page layouts at the time of rendering. This limitation is described in the original specification at paragraphs **[0066]** and **[0067]**.

Independent claims **1, 26, 51, 72, 115** and **124** have been amended to include the limitation that spatial characteristics of text include at least one of (a) positions of characters, (b) heights of characters, (c) widths of characters, (d) widths of words, (e) shapes of characters, (f) spacings between characters, (g) spacings between words, (h) spacings between lines, (i) numbers of characters per line, (j) numbers of words per line, (k) page margins, and (l) paragraph indentations. This limitation is described in the original specification at paragraphs **[0051]** and **[0066] – [0080]**, and illustrated in **FIGS. 1A** and **1B**.

Independent claims **1, 26, 141** and **142** have been amended to include the limitation of patching operating system functions. This limitation is described in the original specification at paragraphs **[0076]** and **[0083] – [0087]** and in original claims **16, 24, 41, 49, 61, 69, 82, 90, 118, 122, 127** and **131**.

CONCLUSION

If the Examiner believes that a conference would be of value in expediting the prosecution of this application, the Examiner is cordially invited to telephone the undersigned counsel at (650) 838-4300 to arrange for such a conference.

No fees are believed to be due beyond those noted in the included transmittal letter, however, the Commissioner is authorized to charge any underpayment in fees to Deposit Account No. 50-2207, including any funds necessitated due to a check being drawn on an account with insufficient funds. To the extent necessary and not otherwise requested, Applicant requests an Extension of Time to respond to the Office Action, and requests that the fee for such an extension be charged to Deposit Account number 50-2207.

Respectfully submitted,
Perkins Coie LLP

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/Glenn E. Von Tersch/
Glenn E. Von Tersch
Registration No. 41,364

Correspondence Address:

Customer No. 22918
Perkins Coie LLP
P.O. Box 2168
Menlo Park, California 94026
(650) 838-4300